

EXHIBIT R

Summary of Plaintiff's Statements Concerning Disclosure of HealthCare Information

Date	Plaintiff's Statement	Truth	Sources
March 16	Refusal to identify any health care providers or records because "privileged"	Privilege waived by Plaintiff when suing for \$30 million of medical and mental injury	Plaintiff's Responses & Objections to First Discovery Requests
April 4	Plaintiff "has sent written requests to her providers, paid the fees associated with copying her files, and is awaiting her providers responses."	Plaintiff had sent only one release to Dr. Olsen. On April 5, Plaintiff sent out releases to five new providers.	Plaintiff's Response to Defendant's Motion to Compel (DE #78) at 18; Response at 7 (chart); McCawley Decl. in Reply to this Motion, Ex. 6 (releases dated April 5)
April 21	"We have disclosed the names. She has those names. We have also disclosed records, the more recent records. We have not contested that. ... We have disclosed the names of the providers."	Plaintiff had disclosed <u>two</u> providers, Dr. Olsen and Hayek in her Addendum to Rule 26 Disclosures on March 22. Plaintiff's other 15 doctors were not disclosed in response until April 29	Transcript of April 21 Hrg. at 21-22 Menninger Decl. Exs. B & F
April 21	Only doctors not yet disclosed were "in the past. We are talking about years and years ago."	Doctors from 2015-2016 not then disclosed: Del Mar, Lightfoot, Donohue, Oliver, Streeter, Geiger, Heaney.	Transcript of April 21 Hrg. at 22-23 Menninger Decl. Ex. B

		<p>Doctors from 2008-2015 not then disclosed: Lightfoot (2011-13), Harris (2011 – 2012), Lee (2011), Mahaliyana (2012), San (2013), Bowen (2009). Psychiatrist from 2008 [REDACTED] Therapist pre-2011.</p> <p>Doctors from 1999-2002 not then disclosed: Devanasan, Kutikoff, Growing Together, Wellington Imaging.</p>	<ul style="list-style-type: none"> • Del Mar – name included in document production of June 28; • Lightfoot – deposition May 4; Records on June 1 and 28 • Donohue – deposition May 4; Records on June 28 • Oliver, Streeter, Geiger, Heaney – records requested May 23, produced June 1
June 28	Plaintiff “innocently forgot” name of Judith Lightfoot until May 3 deposition	[REDACTED] with Lightfoot from October 2015 – May 2016	Resp. at 3. Menninger Decl. Ex. P.
June 28	Donohue records have been disclosed	Disclosed that same day, June 28	Resp. at 9 Menninger Decl. Ex. O
June 28	Hospital doctors were disclosed by Plaintiff and their records produced	Defense served subpoena on Olsen and learned of undisclosed Centura records, provided release to Plaintiff.	Resp. at 3, 6, 9 Menninger Decl. Ex. S